

AUG 17 2022

Clerk, U. S. District Court
Eastern District of Tennessee
At Knoxville

UNITED STATES OF AMERICA

v.

JASON FLENNIKEN,

BRIAN CLIFFORD,

ROBERT HOLMES,

JOSE MANZANAREZ-HERNANDEZ,

ANTHONY MARTIN,

JAVIER SANDERFER, and

ALLEN TEAGUE.

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NO. 3:22-CR-78

JUDGES

Jarlan / McCookINDICTMENTCOUNT ONE

The Grand Jury charges that, from on or about November 5, 2021, up to and including on or about August 8, 2022, in the Eastern District of Tennessee and elsewhere, the defendants, JASON FLENNIKEN, BRYAN CLIFFORD, ROBERT HOLMES, JOSE MANZANAREZ-HERNANDEZ, ANTHONY MARTIN, JAVIER SANDERFER, and ALLEN TEAGUE, did combine, conspire, confederate, and agree with one another and others to knowingly, intentionally, and without authority distribute fifty (50) grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance, all in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(A).

COUNT TWO

The Grand Jury further charges that, on or about August 8, 2022, within the Eastern District of Tennessee, the defendant, JASON FLENNIKEN, did knowingly possess firearms in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, as set forth in Count One of this Indictment, which is incorporated herein by reference, in violation Title 18, United States Code, Sections 924(c).

COUNT THREE

The Grand Jury further charges that, on or about March 29, 2022, within the Eastern District of Tennessee, the defendant, ALLEN TEAGUE, did knowingly possess a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, as set forth in Count One of this Indictment, which is incorporated herein by reference, in violation Title 18, United States Code, Sections 924(c).

COUNT FOUR

The Grand Jury further charges that, on or about August 10, 2022, within the Eastern District of Tennessee, the defendant, ALLEN TEAGUE, did knowingly possess firearms in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, as set forth in Count One of this Indictment, which is incorporated herein by reference, in violation Title 18, United States Code, Sections 924(c).

COUNT FIVE

The Grand Jury further charges that, on or about July 21, 2022, within the Eastern District of Tennessee, the defendant, JOSE MANZANAREZ-HERNANDEZ, an alien, was found in the United States after having been removed or deported therefrom on January 7, 2016, following a conviction on October 23, 2014, for Possession of Methamphetamine, in violation of Georgia Code Section 16-10-31(e), a felony, and not having obtained the express consent of the Secretary of Homeland Security to reapply for admission to the United States, in violation of Title 8, United States Code, Section 1326(a), (b)(1).

FORFEITURE ALLEGATIONS

The allegations contained in Count One of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853.

Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Sections 841 and/or 846, as set forth in Count One of this Indictment, the defendants, JASON FLENNIKEN, BRYAN CLIFFORD, ROBERT HOLMES, JOSE MANZANAREZ-HERNANDEZ, ANTHONY MARTIN, JAVIER SANDERFER, and ALLEN TEAGUE, shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offense, including but not limited to the following:

U.S. Currency

- (a) \$19,680.00 U.S. currency seized from defendant, Jason Flenniken, on or about December 13, 2021; and
- (b) \$3,796.00 U.S. currency seized from defendant, Jose Manzanarez-Hernandez, on or about July 21, 2022.

Money Judgment

Proceeds the defendants, JASON FLENNIKEN, BRYAN CLIFFORD, ROBERT HOLMES, JOSE MANZANAREZ-HERNANDEZ, ANTHONY MARTIN, JAVIER SANDERFER, and ALLEN TEAGUE, personally obtained as a result of the violations of Title 21, United States Code, Sections 841 and/or 846.

The allegations contained in Counts Two, Three, and Four of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

Upon conviction of an offense in violation of Title 18, United States Code, Section 924(c) as set forth in this Indictment, the defendants, JASON FLENNIKEN and ALLEN TEAGUE, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any and all firearms and ammunition involved in the commission of the offense.

Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), the defendants shall forfeit substitute property, up to the value of the property subject to forfeiture, if by any act or omission of the defendant, the property, or any portion thereof:

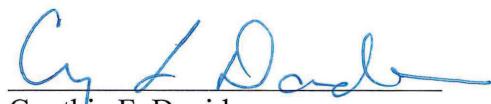
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty.

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SIGNATURE REDACTED

 GRAND JURY FOREPERSON

FRANCIS M. HAMILTON III
UNITED STATES ATTORNEY


Cynthia F. Davidson
Assistant United States Attorney